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9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 DESTINIE MULLEN, an Individual,

13 Plaintiff,

14 vs.

15 NUGENT, LLC, a Nevada limited liability
16 company d/b/a GREAT CLIPS, DOES I -X;
and ROE CORPORATIONS I -X.

17 Defendant.

CASE NO.: 2:19-cv-01109-GMN-GWF

STIPULATION AND ORDER
EXTEND REMAINING DISCOVERY
DEADLINES

(FIRST REQUEST)

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19 The parties, Plaintiff DESTINIE MULLEN (“**Plaintiff**”) and Defendant NUGENT,
20 LLC, a Nevada limited liability company d/b/a GREAT CLIPS (“**Defendant**”), by and through
21 their respective attorneys of record, hereby stipulate and agree as follows:

22 1. That the close of Discovery currently set for July 26, 2020, be extended by a
23 period of sixty (60) days, and become due on September 24, 2020 or as soon thereafter as the
24 Court may allow;

25 2. That all other outstanding discovery deadlines be extended sixty (60) days;

26 3. That the Parties exchanged Initial Disclosures and written discovery requests;
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1 4. That the Parties exchanged responses to the written discovery request;

2 5. That the Parties discussed Defendant amending their discovery responses;

3 6. That Defendant agreed to amend their discovery responses;

4 7. That Plaintiff's counsel and Defendants' counsel have been in contact regarding
5 the suitability of extending discovery in this matter based upon the limitations imposed on all
6 counsel and parties due to COVID-19 pandemic resurging as well as delays in amending
7 discovery responses, which are needed before any meaningful depositions can take place. Both
8 Plaintiff's and Defendant's counsel agree that an extension of the remaining discovery
9 deadlines is warranted for this matter to be fully litigated on the merits and an extension is in
10 the best interests of both the Parties and the Court; and

11
12 8. That the Parties have the following depositions outstanding: Plaintiff, Person
13 Most Knowledgeable for Defendant. The Parties have not taken those depositions because the
14 Parties would prefer to complete the exchange of written discovery. Without a complete
15 exchange of written discovery, the deposition will not be as meaningful.

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17 9. That good cause exists for the request for the Discovery deadline to be extended
18 until September 24, 2020 for the above-specified reasons.

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20 10. All parties believe the requested extension is warranted under the current
21 circumstances and will not result in undue delay in the administration of this cause.

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1 11. This is the first request for an extension of the Scheduling Order in this matter
2 and is made in compliance with Local Rule 26.3.

3 Dated this 10th day of July, 2020.

 Dated this 10th day of July, 2020.

4 **HKM Employment Attorneys LLP**

TCM Law Firm

5
6 /s/ Jenny L. Foley

/s/ Thomas C. Michaelides

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 Attorney for Plaintiff

 Attorney for Defendant

10
11 **ORDER**

12 IT IS SO ORDERED:

13 
14 UNITED STATES MAGISTRATE JUDGE

15 DATED: July 13, 2020